

EXHIBIT FF

In The Matter Of:
Archdeacon v.
Ameron International Corp., et al.

John C. Maddox, MD
Vol. I
August 06, 2015

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<p style="text-align: right;">Page 41</p> <p>1 documents that I've printed out. And, as I said a 2 minute ago, I estimated 25 to 30 pages perhaps. That's 3 an estimate, not a count. 4 Next I have what's called an asbestos 5 case worksheet. It's kind of torn, unfortunately. But 6 this is what my secretary has recorded as having been 7 received by us and then returned to the law firm. 8 Next I have a -- a FedEx airbill that was 9 created when the material was returned to the law firm 10 on March the 13th. 11 Next I have what's called a Riverside 12 pathology request slip, which is an internal document 13 used by the secretaries to assign an accession number 14 and listing the materials received. 15 So that's -- that's Exhibit Number 31. 16 Q I did not notice any financial or billing 17 information between you or your facility and the 18 plaintiff's law firm in that summary. Is there one in 19 there that I missed? 20 A I don't think so. 21 Q Where are the billing records regarding 22 this matter or how does that work? 23 A Now, if you're referring to Peninsula 24 Pathology Associates, of which I am a member, billing 25 Simon Greenstone Panatier and Bartlett, we do not keep</p>	<p style="text-align: right;">Page 43</p> <p>1 stains or slides in our lab. We looked at the slides 2 that were already available and rendered a diagnosis 3 based on them, on those slides, as well as the medical 4 records, the pathology reports that perhaps listed a 5 few other stains as well. 6 Q For three and a half hours, what was the 7 billing rate? 8 A These were billed at a rate of five 9 hundred dollars per hour. 10 Q And is that a standard rate for all of 11 the activities that you engage in in dealing with 12 asbestos litigation or do you have different rates for 13 different things? 14 A The -- the rate was four hundred dollars 15 an hour until very early in 2014 and then it was 16 increased to five hundred dollars an hour. 17 There's some discussion about a special 18 increase for depositions that go longer than four 19 hours; we're thinking about doubling the rate for 20 those. But, other than that, I think it will stay at 21 the five hundred dollars per hour for the foreseeable 22 future. 23 Q You understand you're under oath. 24 A Yes, sir, I am under oath. 25 Q Can you describe to me the -- the billing</p>
<p style="text-align: right;">Page 42</p> <p>1 records of that sort here. We use a bookkeeper. That 2 would be J. Moore & Associates located in Roanoke, 3 Virginia. 4 Now, I can estimate for you that we 5 probably bill for about three or three and a half hours 6 of review and photography, and so forth, for that. 7 That's -- that's the usual amount. 8 Now, the billing is done by the company 9 and the -- the payments come in to the company. I am a 10 partner in that professional corporation and I 11 personally would receive approximately 30 percent of 12 what was billed out; 10 -- 10 percent for the cost of 13 billing and then three partners 30 percent each. 14 Q So is your estimate for all of the work 15 involved leading to the point of preparing and issuing 16 your report for three and a half hours of labor? 17 A Yes. Yes, sir, that would be correct. 18 Q And any other materials or laboratory 19 costs? 20 A I don't think so. I don't see -- I don't 21 see -- let me just check something. 22 I had said that there was no unstained, 23 recuts or paraffin blocks, so no additional 24 immunostains can be prepared. 25 Therefore, we did not have to prepare any</p>	<p style="text-align: right;">Page 44</p> <p>1 and distribution arrangement again? 2 Five hundred dollars per hour goes to 3 several partners and a portion goes to bookkeeping? 4 Did I get that right? Who -- who are the partners? 5 Can you summarize that for me? 6 A Okay, sure. 7 The company in question is Peninsula 8 Pathology Associates, Incorporated, which is a 9 professional service corporation. There are three 10 partners, which would be myself, I guess you'd say I'm 11 the senior partner because I'm the oldest, the managing 12 partner is Dr. David Smith, and the other partner is 13 Dr. Michael Schwartz. 14 This corporation has been around for 15 several decades. I can't tell you when it was first 16 incorporated, but, at any rate, we -- we bill for 17 services and the payments come back into the 18 corporation after the -- the cost of billing is 19 deducted by the company, J. Moore & Associates, the 20 accounting and bookkeeping firm, then the remaining 21 90 percent is equally split against the three partners. 22 Q Have the other two partners, Doctors 23 Smith and Schwartz, done anything with regard to the 24 Archdeacon matter? 25 A No, sir, they have not.</p>